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August 5, 2016

Honorable Cathy Seibel  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150  
VIA CM/ECF

RE: Corey Marrow v. City of Mount Vernon, et al.; 14 CV 5473 (CS)  
Joint Letter Motion for a Three Month Extension of Discovery Deadlines and  
Adjournment of September 9, 2016 Status Conference

Dear Judge Seibel:

I represent the plaintiff in the above-referenced matter. In accordance with Your Honor's Individual Rules, I write jointly with defendants' counsel to respectfully request an extension of the discovery deadlines. I apologize for not writing sooner, but back to back I had an appellate briefing to the Second Circuit, and a trial; defense counsel, Ms. Johnson, was away from the office, and the parties were unable to schedule depositions prior to the end of July.

The parties are in the midst of exchanging discovery, but require additional time to complete depositions and expert discovery. As such, the parties respectfully request a three month extension of all discovery deadlines with the following proposed deadlines:

DUE DATE	DESCRIPTION	PROPOSED DEADLINE
7/29/16	All fact discovery shall be completed	10/29/16
7/29/16	All fact depositions shall be completed	10/29/16
7/29/16	Requests to Admit, if any, are to be served by	10/29/16
8/26/16	All expert discovery is to be completed by	11/26/16

Please note that the parties have not previously sought an extension of the discovery deadlines.

The parties also respectfully request that the September 9, 2016 status conference before Your Honor be adjourned until after the conclusion of expert discovery.

Thank you in advance for your consideration.

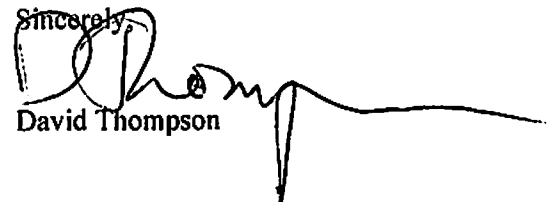
Respectfully submitted,

David A. Thompson (DT3991)

&

Tichina L. Johnson (TJ 2515)

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Thompson', with a long horizontal flourish extending to the right. The signature is written over the printed name 'David Thompson'.

David Thompson